

2023 7/5/23

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Attorney for Plaintiff Chapter 7 Trustee
Christopher P. Burke

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

oOo

BK-N- 20-50660-GS
CHAPTER 7

IN RE

METAL RECOVERY SOLUTIONS,
INC., aka MRS, INC,

Debtor(s).

Hearing Date: _____
and Time: _____
Mtn No. _____

NOTICE OF ELEMENT GLOBAL INC
FAILURE TO DELIVER FUNDS

To:

Louis Bubala - lbubala@kcnvlaw.com
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L. Edward Humphrey - ed@hlawnv.com
Seth J. Adams - sadams@woodburnandwedge.com
Elizabeth Fletcher - efletcher@fletcherlawgroup.com
Ellen Ostrow - eostrow@foley.com
Amy Tirre - amy@amytirrelaw.com
Christopher Burke - trusteeburke@gmail.com

Please take notice that Element Global Inc has failed to deliver the
\$2,450,000 of funds required under this Court's May 5, 2023 Order
Approving Trustee's Motion to Approve Sale of Claims and Other
Bankruptcy estate Assets (ECF 317).

1 Specifically, the Chapter 7 Trustee had filed an Amended Notice of
2 Extension of Time for Element Global, Inc. to tender the \$2,500,000
3 pursuant to this Court's May 5, 2023 Order (ECF 329). Under the
4 amended notice, Element Global, Inc. had through Friday, June 30, 2023
5 to tender the remaining \$2,450,000, having first paid the non-
6 refundable down payment of \$50,000.

7 As of midnight on June 30, 2023, the Trustee has not received
8 these funds.

9
10 Dated: This 3 day of July, 2023

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13 By: _____

14 Michael Lehnners, Esq.
15 429 Marsh Ave.
16 Reno, Nevada 89509
17 Nevada Bar Number 003331
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CERTIFICATE OF SERVICE BY MAIL

Pursuant to Federal Rule of Civil Procedure 5(b), I certify that on the 5th day of July, 2023 I deposited for mailing in the United States Post Office in Reno, Nevada, with postage thereon fully prepaid, a true copy of the within **NOTICE OF ELEMENT GLOBAL, INC., FAILURE TO DELIVER FUNDS** addressed as follows:

Amy Tirre, Esq.
3715 Lakeside Drive
Suite A
Reno, NV 89509

Seth Adams, Esq.
Woodburn and Wedge
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Fletcher & Lee
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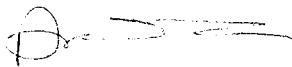
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U.S. Trustee
300 Booth Street. Room 3009
Reno, NV 89509

In addition a copy of the attached document was served to all registered participants in this case through the court's ECF system upon filing.



Dolores Stigall